

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

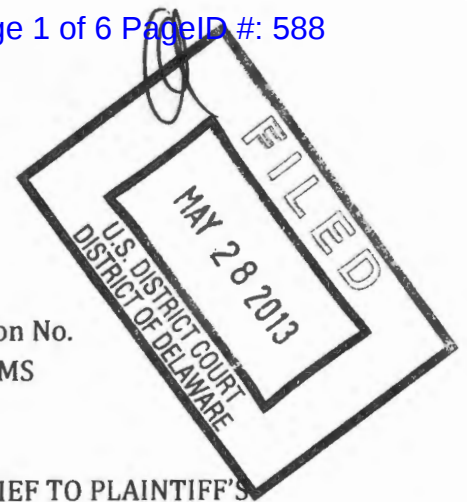
KAROLINA KARPOV,
Plaintiff,

Civil Action No.
12:1411-GMS

-against-

VLADIMIR KARPOV
Defendant.

ANSWERING BRIEF TO PLAINTIFF'S
MOTION TO STRIKE ANSWERS



I recently received the Notice of Appeal from Karolina as well as the informal brief that she submitted. I would like to assure this court that these motions that plaintiff is submitting are all being written by Peter Lomtevas. Karolina would never be able to prepare these documents on her own. She is signing them and submitting them. My brother-in-law, Peter is participating in this case without declaring interest. Concealing an identity in cases in any court, especially District as well as in the Appellate Court is shameful for any attorney.

I would like to make a point to this court that every single page of his motions are masterminded and executed by him. Karolina has been used as a tool in this harassment towards my wife, me and my children. As You can see, he ignored Hon. Judge Gregory M. Sleet's warning and is continuing to aid Karolina in ghost-writing. This is a hate crime orchestrated by Peter and his wife. They have been for years harassing my family and now this harassment has become both emotional and psychological abuse. Mr. Peter Lomtevas is committing a hate crime by doing this and his abuse is becoming unbearable for me, my wife, and my children. It has already cause irreparable damage to relationships between

my children and my wife and our friends. I would like to respectfully ask the court to once more warn Mr. Lomtevas and his wife Vera in the strongest possible form to stop this abuse to my family and me.

Also, in the Notice of Appeal, Mr. Lomtevas, using Karolina is asking the court to transfer the case back to New York. This is the most significant reason for the appeal. There would be no possibility of the case being transferred back as New York does not have jurisdiction over me and my wife but this shows that Mr. Lomtevas is interested in aiding Karolina in New York in this case. This case is capable of being resolved in Delaware and needs no transfer.

It is very visible that Mr. Lomtevas is using extremely dramatized and perverted language. With this language he has brainwashed Karolina and made her believe that she was raped, is sick, has post-traumatic stress disorder, and so on. The most significant detail is that there is no proof in the form of medical records from the time that she claims that she was raped. If she had any medical evidence, she should have served it with her original complaint. As You know, she tried to subpoena the Justice Department to release the privileged documents from my closed case so that she would have some kind of evidence. This was done to impress the court and to intimidate the defendants.

Due to my unfortunate situation, I understand my opinion can be less acceptable but my arguments are strong. I would like the court to take notice of the fact that upon the arrival to the United States of the Gorbataya family, my wife and I personally in February of 2007 transferred Karolina to the Gorbataya family for a family reunion. She was in excellent physical, emotional and mental condition. Astor Family Services now claim that she suffers from post-traumatic stress disorder. This is extremely sad and can only be

credited to Peter and Vera Lomtevas. The relationship between the Gorbatiye and my wife and I was very strong while they were in Ukraine, but upon arrival to U.S., Vera and Peter Lomtevas brainwashed them to believe differently about us and influenced them very negatively. Karolina had a very good reason to run away from the Gorbataya family and never turn back. Nina and Hobart only kept Karolina around for the child support money which Nina used to start up a cosmetology business while keeping a life-insurance policy on her in hopes of cashing in if any event were to occur were she was fatally harmed. This just goes to show how greedy they are. Nina's hopes of making hundreds of thousands of dollars per year to keep Karolina, failed. They wanted \$102,000.00/year from Svetlana and sued her for such. (Docket # 45977 in the Family Court of the State of New York, County of Dutchess.) Mr. Lomtevas would never add a "mouth to feed." He has his own children to worry about and so Karolina went to Hudson River Housing. She became a public charge because the people who are supposedly trying to "help" her, at the same time don't want anything to do with her and keep her around for their use. They are just waiting for green dollar bills to float down from the sky. Karolina's post-traumatic stress disorder, if she really has one, is definitely from Mr. Lomtevas and his wife Vera. All that Mr./Mrs. Lomtevas have demonstrated is hatred, greed and envy and everyone knows how miserable these people are.

In reference to this case, I would like to thank You for removing my children from it as they are irrelevant to this proceeding. I would now like to respectfully plead with this court to remove my wife, Svetlana Karpov, as well. She is completely innocent and there is nothing to prove otherwise. All the accusations against her are false and are specifically made up to inflict emotional and psychological harm on her. She is a defenseless woman

who has been suffering for years from Hypo-thyroid and is currently in the care of one of our daughters. This case is stressing her out emotionally, physically, and psychologically and simply, there is no evidence to support all the outrageous lies that the plaintiff and Mr./Mrs. Lomtevas have stated against her.

In the light of the above, I would like to respectfully ask the court to dismiss the case against me and my wife with prejudice. Also, I would like to ask the court to dismiss the case against me as well as the plaintiff and her accomplices have not provided any facts and evidence to support their accusations against me. I have accepted the plea bargain. This case is supposed to be about monetary compensation. It shouldn't be about whether someone is guilty or not. That process is over. It is now a question of proving irreparable injury while providing evidence. No evidence is available, so how can this case sustain its status in court as proceeding? It should be dismissed.

I am fully committed in cooperating with the court in any aspects of this case. I vow to provide honest and forth going answers and statements to all matters related in this case.

Sincerely,


Vladimir Karpov

I affirm I have mailed a copy of this answering brief to plaintiffs motion to strike to:

1. US District Court, District of Delaware (1 copy)
844 N King Street
Unit 18
Wilmington, DE 19801
2. Plaintiff, Karolina Karpov (1 copy)
305 Mill Street
Apt 2A
Poughkeepsie, NY 12601
3. Defendant, Svetlana Karpov (1 copy)
PO BOX 80245
Lincoln, NE 68501

Signed,

V. Karpov
Vladimir Karpov

NAME Vladimir Rarpov
SBI# 433133 UNIT F
JAMES T. VAUGHN CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



US District Court of DE
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Unit 18
Wilmington, DE
19801-3570